

PRIVACY POLICY FOR PAYDAY: CRIME WAR

1. GENERAL INFORMATION

Starbreeze Publishing AB, company registration number 556779-9654 having its registered address at Regeringsgatan 38, Stockholm, Sweden (“**We**”). This document contains a policy statement regarding Starbreeze Publishing AB collection, use and processing of Personal Data (“**Privacy Policy**”). This privacy policy is applicable when you interact with the PAYDAY: Crime War website and newsletter service (collectively the “**Services**”).

All definitions in this Privacy Policy shall be interpreted in accordance with applicable data protection laws which refers to the Swedish Personal Data Act (1998:204), which implements the EU directive 95/46/EC, and the General Data Protection Regulation (Regulation no. 2016/679) and the Directive on Privacy and Electronic Communications (Directive 2002/58/EC), as well as the national implementations and related national legislation.

2. PROCESSED DATA

We will process the following personal data when registering for, signing up to, using, giving feedback and communicating with the Service:

- (a) name;
- (b) email address;
- (c) IP address;
- (d) address;
- (e) telephone and mobile number;
- (f) gamertag and/or nickname on game platforms;
- (g) location data; and
- (h) information about your mobile device or tablet in terms of brand, model and operating system.

We are unable to provide you with the Services unless you provide us with the personal data above. The processing of the personal data above is necessary to enter into the agreement with us and is necessary to maintain the contractual relationship between you and us.

3. PURPOSES OF PROCESSING

We will process the personal data set out above for the following purposes:

- a) to administrate your account, to enable and provide the Services and integration with third party services, and to provide, personalize and improve your experience with the Services, and to otherwise provide the Services according to the terms of use;
- b) to send you alerts or messages by email or otherwise, including to provide you with marketing of our and our related parties’ products and services;
- c) to inform you about updates of the Services or the terms of use;

- d) to enforce the terms of use, including to protect our rights, property and safety and also the rights, property and safety of third parties if necessary; and
- e) to fulfil requirements by law.

4. LEGAL GROUND

Fulfilment of contract. By agreeing to this Privacy Policy we process your personal data so that you can use the Services.

Legitimate interest. The processing of your personal data for the purposes of using the Services is conducted on the basis of the legitimate interest of **Starbreeze Publishing AB**. Our legitimate interest for the processing is that we need to log data when you use the Services to be able to maintain sufficient IT-security, to evade fraud and to protect the Services from cyber threats. We also log data for the maintaining and improvement of our Services and in order to have your feedback and gameplay data.

5. DISCLOSURE OF PERSONAL DATA

We may share and disclose your personal data above to forum service providers, cloud service providers, game publishers, service providers hosting the Website and game analytics services to be able to provide services needed to ensure the Services.

Forum service provider	Canada	EU Commission adequacy decision
Cloud service provider	USA	EU Model Clauses
E-mail service provider	USA	EU Model Clauses
Hosting services provider	Sweden	

Our forum service provider, e-mail service provider and cloud service provider are located outside the EU/EEA and we are therefore applying relevant safeguards for the data transfers to this/these recipients. You can acquire further information regarding the transfer by contacting us.

When using the Services you may be directed to other websites where the personal data collected is not in our control. The privacy policy of the other website will govern the personal data obtained from you on that website.

6. RESPONDING TO LEGAL REQUESTS AND PREVENTING HARM

We may access, preserve and share your personal data in response to a legal request (like a search warrant, court order or a subpoena or the like), or when necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and other users, including as part of investigations.

7. COOKIES, PIXELS AND OTHER SYSTEM TECHNOLOGIES

We collect information by using technology such as cookies, pixels and tags (on your browser or device).

8. RETENTION

We store your personal data for three (3) years after your latest use of the Services to perform the Services.

9. CHILDREN

The Services are not directed to persons under the age of eighteen (18). No parental consent is needed as there is no one under the age of eighteen (18) that is allowed to use the Services.

10. YOUR RIGHTS

You have an absolute right to object to the processing of your personal data for direct marketing. You also have the right to recall your prior given consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and we may continue processing your personal data based on other legal grounds, except for direct marketing.

You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge once (1) every calendar year. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.

If the processing is based on the legal grounds consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers.

11. CONTACT INFORMATION

To exercise your rights, or if you have any questions regarding our processing of your personal data, please contact us) at the following address: dpo@starbreeze.com. In your email please state your full name, your user name and nick name in the Services. The email address you use needs to be the same one as used when registered to the Services. Note that you should sign the request to receive information of the processing of your personal data yourself.

If you have any complaints regarding our processing of your personal data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

12. NOTICE OF CHANGES TO THE PRIVACY POLICY

If we make changes to this Privacy Policy we will notify you by in the closed forum for the Services. If your consent is required due to the changes, we will provide you additional prominent notice as appropriate under the circumstances and, ask for your consent in accordance with applicable law.
